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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CR05 0274Z

UNITED STATES OF AMERICA,

Plaintiff,

v.

COLLIN PATRICK SARGENT,

Defendant.

INFORMATION



05-CR-00274-INFO

The United States Attorney charges that:

**COUNT ONE**

(Conspiracy Against Rights)

On or about July 8, 2004, in the Western District of Washington and elsewhere within the jurisdiction of this Court, COLLIN PATRICK SARGENT along with other persons known and unknown to the United States Attorney, did knowingly and willfully combine, conspire, and agree to injure, oppress, threaten and intimidate A.A. and A.A.'s family, who are Iranian-American and are residents of Edmonds, Washington, in the free exercise and enjoyment of a right secured to them by the laws and Constitution of the United States; that is, the right to lease and hold real property, a dwelling, without injury, intimidation or interference because of their race, color, and national origin.

**OBJECT OF THE CONSPIRACY**

It was the plan and object of the conspiracy to erect and burn a cross on A.A.'s family property in order to intimidate and threaten the victims by leading them to believe

1 that they were targeted by an unknown hate group and thereby interfering with the  
2 exercise of their protected rights.

3 **MANNER AND MEANS**

4 In order to carry out the object of the conspiracy, the conspirators would and did  
5 construct a cross, take the cross to the yard of A.A.'s family, and set it on fire.

6 **OVERT ACTS**

7 In furtherance of the conspiracy, and to accomplish the objects of the conspiracy,  
8 COLLIN SARGENT along with others, known and unknown to the United States  
9 Attorney, committed various overt acts on or about July 8, 2004, within the Western  
10 District of Washington and elsewhere within the jurisdiction of this Court, including but  
11 not limited to the following:

12 1. COLLIN SARGENT, along with other persons known and unknown to the  
13 United States Attorney, discussed plans to erect a burning cross on A.A.'s family  
14 property;

15 2. COLLIN SARGENT, along with other persons known and unknown to the  
16 United States Attorney, constructed a wooden cross.

17 3. A known co-conspirator etched A.A.'s name into the wooden cross.

18 4. COLLIN SARGENT drove the cross, along with a shovel and can of  
19 flammable liquid, to the victim's residence.

20 5. COLLIN SARGENT, along with other persons known and unknown to the  
21 United States Attorney, placed the cross on the property of A.A.'s family, doused it with a  
22 flammable liquid, and set it on fire.

23 6. After the cross was set on fire, a person known to the United States  
24 Attorney communicated with A.A. through a friend to inform him that a cross had been

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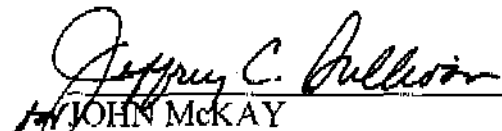
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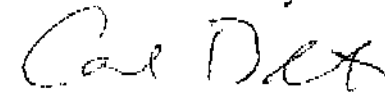
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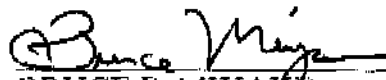
1 burned in his yard.

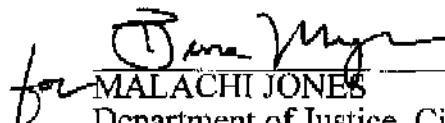
2 All in violation of Title 18, United States Code, Section 241.

3  
4 DATED this 15<sup>th</sup> day of July, 2005.

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6   
7 JOHN MCKAY  
8 United States Attorney

9   
10 CARL BLACKSTONE  
11 Assistant United States Attorney

12   
13 BRUCE F. MIYAKE  
14 Assistant United States Attorney

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16 MALACHI JONES  
17 Department of Justice, Civil Rights Division  
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